

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re:

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SKIN LOGIC, LLC,

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**Case No. 23-11352 (KHK)
Chapter 11**

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Debtor.

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**JOINDER OF ATLANTIC UNION BANK TO HARRY
KAMIN'S RESPONSE TO U.S. TRUSTEE'S MOTION TO
CONVERT OR DISMISS CHAPTER 11 CASE**

Atlantic Union Bank ("Atlantic Union"), by its undersigned counsel, hereby joins (the "Joinder") in the *Response to the U.S. Trustee's Motion to Convert or Dismiss Chapter 11 Case* [Dkt. No. 136] (the "Kamin Response") responding to the motion to convert or dismiss the above captioned case filed by the United States Trustee [Dkt. No. 132] (the "Conversion Motion"), and in support thereof states as follows.

JOINDER

Atlantic Union joins in the relief requested in the Kamin Response as if set forth herein and requests that the Court convert this case to a case under chapter 7 of the Bankruptcy Code. Atlantic Union is the secured lender to BNG Group LLC, the Debtor's landlord. Atlantic Union shares the concerns raised in the Kamin Response, including that the dismissal of this case will, among many other consequences, (i) result in the continued non-payment of rent to BNG Group thus affecting its ability to operate its building, (ii) result in the dissipation of the Debtor's remaining assets, and (iii) and allow the Debtor to simply file a second bankruptcy case upon any effort of creditors or other parties in interest including BNG Group to enforce their state law rights and remedies. Given the history of bad acts by the Debtor's principals alleged in the Kamin

Response, this case should be converted to chapter 7 to enable a trustee to wind up the Debtor in an efficient and equitable manner.

WHEREFORE, for the reasons set forth herein, Atlantic Union respectfully requests that this Court convert the Debtor's case to a case under chapter 7 of the Bankruptcy Code and grant such other and further relief as may be necessary and appropriate.

Dated: July 28, 2024

Respectfully submitted,

/s/ David W. Gaffey
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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2024, a copy of the foregoing was filed and served via the Court's Electronic Case Filing System on all parties receiving such notification.

/s/ David W. Gaffey
Counsel